

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO

as representative of
THE COMMONWEALTH OF PUERTO RICO,
et al.

Debtors¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

NORTH SIGHT COMMUNICATIONS, INC.

v.

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO

as representative of
THE COMMONWEALTH OF PUERTO RICO

Debtor

PROMESA

Title III

No. 17 BK 3283-LTS

Re: ECF No. 23269

MOTION FOR EXTENSION OF TIME

TO THE HONORABLE COURT:

COMES NOW, North Sight Communications, Inc. (“NSCI”), through its undersigned counsel, and very respectfully states and prays:

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567- LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

1. On January 18, 2023, NSCI filed *North Sight Communications, Inc.’s Motion for Allowance and Payment of Post-Petition Administrative Expense Claim* (ECF No. 23269) (the “Motion”), pursuant to the Honorable Court’s *Order Extending Administrative Claim Bar Date for Certain Parties and Modifying Discharge Injunction* (ECF No. 22650) entered on October 20, 2022.

2. On January 19, 2022, the Honorable Court entered an *Order Scheduling Briefing* of the Motion (ECF No. 23282), pursuant to which the deadline to file responsive papers to the Motion was February 1, 2023, and NSCI’s reply papers was February 8, 2023.

3. On January 30, 2023, the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole representative of the Commonwealth of Puerto Rico (the “Commonwealth”), filed a consensual motion and requested an extension of the deadlines regarding the Motion (ECF No. 23437), to wit, until March 3, 2023 to file its response to the Motion, and until March 17, 2023 for NSCI to file its reply. The Honorable Court granted the extension on January 31, 2023 (ECF No. 23443).

4. On March 3, 2023, the Oversight Board filed a consensual motion and requested an additional extension of the deadlines regarding the Motion (ECF No. 23671), to wit, until March 3, 2023 to file its response to the Motion, and until March 24, 2023 for NSCI to file its reply. The Honorable Court granted the extension on April 10, 2023 (ECF No. 23694).

5. On March 23, 2023, the Oversight Board, filed a consensual motion and requested an additional extension of the deadlines regarding the Motion (ECF No. 23867), to wit, until April 7, 2023 to file its response to the Motion, and until April 24, 2023 for NSCI to file its reply.

6. On April 7, 2023, the Oversight Board filed its Objection to the Motion (ECF No. 23948).

7. NSCI has reviewed the Oversight Board's objection and has determined that a reply is warranted. Therefore, in order to file its reply in a responsible and appropriate manner, NSCI hereby requests an extension of ten (10) days, to wit, from April 24, 2023 to **May 4, 2023 at 5:00 p.m. (Atlantic Standard Time)**, to file its reply to the Oversight Board's objection. NSCI has made good faith communication with the Oversight Board, who has consented to the extension requested herein.

WHEREFORE, NSCI respectfully requests that the Honorable Court grant the extension requested herein and enter an Order extending the deadline for NSCI to file its reply to the Oversight Board's objection to May 4, 2023 at 5:00 p.m. (Atlantic Standard Time).

CERTIFICATE OF SERVICE: I hereby certify that on this same date I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send electronic notice of said filing to all ECF participants.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico on April 19, 2023.

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